

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In re: Sophia Kassan Al-Roubaie) Case 20-60465
)
)
Debtor(s))

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

Debtor, for this Response to Trustee's Motion to Dismiss states:

1. Debtor will make an additional payment of \$79.00 per month beginning March 2023 through August 2023 to cure the delinquency.
2. Debtor is on an Employer Wage Order and had an increase in her plan payment but her employer did not make the adjustment to her payments which caused her to become delinquent. Debtor will contact her payroll department to ensure that they have the amended wage order filed on July 21, 2022.
3. Debtor will be completely current by August 31, 2023.

WHEREFORE, Debtor prays the Court to deny Trustee's Motion to Dismiss and for such other relief as the Court deems just and proper.

Dated: 03/07/2023

Respectfully submitted,
Licata Bankruptcy Firm, P.C.
/s/Marc D. Licata

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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2023, the foregoing was delivered via e-mail to the parties that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties that are not registered to receive electronic filings on ECF.

Richard V. Fink, Chapter 13 Trustee
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Kansas City, MO 64106-1910

/s/Marc D. Licata